

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Scott H. Kaliko (SK 1163)
YK Law LLP
32 E. 57TH Street
8th Floor
New York, NY 10022
Tel: 201-739-5555
212-837-2600 Ext. 1019
Fax: 201-603-1142

Attorneys for Plaintiff

HEXIN HOLDING LIMITED

Plaintiff,

v.

PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
LISTED ON SCHEDULE A;

ABC CORPS 1-100;

JOHN/JANE DOES 1-100.

Defendants.

Case No.:

PLAINTIFF’S *EX PARTE* MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff Hexin Holding Limited (“Plaintiff”) hereby moves *ex parte* and files this Motion requesting leave to file the following documents under seal: (1) Schedule A attached to Plaintiff’s Complaint, which lists the fully interactive e-commerce stores operating under the seller aliases (the “Seller Aliases) and the e-commerce stores URLS under the Online Marketplaces; (2) Declaration of Juan Yang and exhibits, which includes a sample of screenshot

printouts showing e-commerce stores operating under the Seller Aliases (3) Declaration of Scott H. Kaliko and exhibits.

Good cause exists for this Court to grant the requested relief *ex parte* as the underlying action involves allegations of copyright infringement, and therefore sealing of the requested materials is necessary to prevent Defendants from learning of these proceedings prior to the execution of a temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence and the hiding or transferring of assets to foreign jurisdictions, which would frustrate the purpose of the underlying action and would substantially interfere with the Court's power to grant relief. Should the Court grant this motion and permit the sealing of the requested materials, Plaintiff will move to unseal the requested materials after service of the temporary restraining order has been effectuated upon Defendants.

Dated this 17th day of December 2021.

Memo Endorsed: The application is granted in part. The Declaration of Scott H. Kaliko and exhibits contain no information that could alert Defendants to these proceedings. Accordingly, Plaintiff has not set forth any reasons to overcome the presumption of public access to those documents. See Lugosch v. Pyramid Co. of Onondaga, 435 F.3d 110, 119-20 (2d Cir. 2006). The Clerk of Court is directed to seal Dkt. Nos. 2-1, 2-2, 2-3, 9, 15, 15-1, and 15-2, so that those documents are viewable only by the Court and Plaintiff Hexin Holding Limited. The Clerk of Court is further directed: (1) to remove the names of individual Defendants in the case caption so that the caption in this matter appears as Hexin Holding Limited v. The Partnerships and Unicorporated Associations identified in Schedule A; and (2) to terminate the pending motion at Dkt. No. 1.

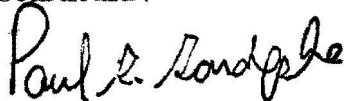
Respectfully submitted,

By: s/ Scott H Kaliko /

Scott H. Kaliko (SK1163)
YK Law LLP
633 Wyckoff Ave
Wyckoff, NJ 07481
skaliko@yklaw.us
Tel: 201-739-5555
Fax: 201-603-1142

Attorneys for Plaintiff

SO ORDERED.



Paul G. Gardephe
United States District Judge

Dated: January 20, 2022